

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GINA CRISCIONE, et al.)	CASE NO. 1:24-CV-01446
)	
Plaintiffs)	JUDGE PAMELA A. BARKER
)	
vs.)	<u>DEFENDANTS EAST PARK</u>
)	<u>RETIREMENT COMMUNITY, INC.,</u>
LAURA DiVINCENZO, et al.)	<u>LAURA DIVINCENZO AND SARA</u>
)	<u>THURMER'S MOTION FOR EXTENSION</u>
Defendants)	<u>OF TIME TO FILE REPLY IN SUPPORT</u>
)	<u>MOTION TO STAY DISCOVERY</u>

Defendants East Park Retirement Community, Inc., Laura DiVincenzo and Sara Thurmer move for a seven (7) day extension of time to file a Reply in Support of their Motion to Stay Discovery. Currently, Defendants reply brief is due on July 31, 2025. On July 15, 2025, Plaintiff requested an extension of time to respond to the Motion to Stay Discovery. In their filing, Plaintiff indicated a willingness to reach an agreement as to at least some of the issues raised in Defendants' motion. To date, the parties have been unable to discuss this issue. However, on July 25, 2025, Plaintiff's counsel advised that he was out of the office until August 2, 2025, but would be available upon his return.

Additionally, due to the press of other business, defense counsel needs a brief extension of time to fully address the issues raised in Plaintiff's Brief in Opposition. Accordingly, a seven (7) day extension of time until August 7, 2025, is necessary.

Respectfully submitted,

/s/Emily R. Yoder

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Attorney for Defendants

East Park Retirement Community, Inc.,

Laura DiVincenzo and Sara Thurmer

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing *Defendants East Park Retirement Community, Inc., Laura DiVincenzo, and Sara Thurmer's Motion for Extension of Time to File Reply in Support of Motion to Stay Discovery* was filed electronically on July 30, 2025, with the Clerk using the CM/ECF system, which will notify all parties. Parties may access this document through the court's electronic-filing system.

/s/ Emily R. Yoder

Emily R. Yoder (0084013)
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<<HCP #1410842-v1>>